

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC.; VALEANT  
PHARMACEUTICALS INTERNATIONAL; and  
AGMS, INC.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF CANADA;  
ACE INA INSURANCE COMPANY; ALLIANZ  
GLOBAL RISKS US INSURANCE COMPANY;  
ARCH INSURANCE CANADA LTD; EVEREST  
INSURANCE COMPANY OF CANADA;  
HARTFORD FIRE INSURANCE COMPANY;  
IRONSHORE CANADA LTD.; LIBERTY  
INTERNATONAL UNDERWRITERS; a division  
of LIBERTY MUTUAL INSURANCE  
COMPANY; LIBERTY MUTUAL INSURANCE  
COMPANY; LLOYD'S UNDERWRITERS;  
LLOYD'S CONSORTIUM 9885 (a/k/a STARR  
FINANCIAL LINES CONSORTIUM 9885);  
LLOYD'S SYNDICATE ANV 1861; LLOYD'S  
SYNDICATE AMA 1200; LLOYD'S  
SYNDICATE ARGO 1200; LLOYD'S  
SYNDICATE AWH 2232; LLOYD'S  
SYNDICATE BRT 2987; LLOYD'S SYNDICATE  
CVS 1919; LLOYD'S SYNDICATE HCC 4141;  
LLOYD'S SYNDICATE MITSUI 3210; LLOYD'S  
SYDNICATE MIT 3210; LLOYD'S SYNDICATE  
NAV 1221; LLOYD'S SYNDICATE QBE 1886;  
LLOYD'S SYNDICATE SJC 2003; ROYAL &  
SUN ALLIANCE INSURANCE COMPANY OF  
CANADA; TEMPLE INSURANCE COMPANY;  
and XL INSURANCE COMPANY SE.,

Defendants.

Civil Action No.: 3:18-cv-00493-AET-  
TJB

TO: THE JUDGES OF THE UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF NEW JERSEY

CC: COUNSEL OF RECORD

**NOTICE OF JOINDER IN REMOVAL**

Defendants Liberty International Underwriters, a division of Liberty Mutual Insurance Company; Liberty Mutual Insurance Company; Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613 (incorrectly named as "Lloyd's Syndicate CVS 1919"); Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913 (incorrectly named as "Lloyd's Syndicate QBE 1886" and "Lloyd's Syndicate ANV 1861"); Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013 (incorrectly named as "Lloyd's Syndicate Mitsui 3210"); Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612 (incorrectly named as "Lloyd's Consortium 9885 (a/k/a Starr Financial Lines Consortium 9885)" and "Lloyd's Syndicate QBE 1886"); Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500642 (incorrectly named as "Lloyd's Syndicate Argo 1200"); Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626 (incorrectly named as "Lloyd's Syndicate MIT 3210"); Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500618 via Syndicate 1886 (incorrectly named as "Lloyd's Syndicate QBE 1886" and "Lloyd's Syndicate ANV 1861"); Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629 (incorrectly named as "Lloyd's Syndicate MIT 3210" and "Lloyd's Syndicate AMA 1200"); and Royal & Sun Alliance Insurance Company of Canada, and ACE INA Insurance Company (collectively, the "Joining Defendants") hereby file their Notice of Joinder and state as follows:

1. The Joining Defendants have been named as Defendants in this matter, which stems from an insurance coverage dispute with the Plaintiffs.

2. The Joining Defendants have each received a copy of the Complaint filed by Plaintiffs on or about December 7, 2017 in the Superior Court of New Jersey, Law Division, Somerset County, where it was assigned docket number SOM-L-1483-17.

3. The Joining Defendants understand that this matter was removed to the United States District Court for the District of New Jersey by Defendant Hartford Fire Insurance Company by way of Notice of Removal electronically filed on or about January 12, 2018 [DE #1].

4. Pursuant to 28 U.S.C. §1446(c), the Joining Defendants hereby consent to the removal of this action from the Superior Court of New Jersey, Law Division, Somerset County, and join in the petition filed by Hartford Fire Insurance Company on or about January 12, 2018 [DE #1].

5. The Joining Defendants' presence in this case would not upset the basis of this Court's jurisdiction as set forth in the removal papers filed by Hartford Fire Insurance Company.

Respectfully submitted,

By: s/ Sean X. Kelly  
Sean X. Kelly  
Melissa J. Brown  
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and

Christopher T. Conrad (pending admission *pro hac vice*)  
David A. Wilford (pending admission *pro hac vice*)

Sabina B. Danek (pending admission *pro hac vice*)  
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Attorneys for Defendants

Liberty International Underwriters, a division of Liberty Mutual Insurance Company;  
Liberty Mutual Insurance Company;  
Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613 (incorrectly named as "Lloyd's Syndicate CVS 1919");  
Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913 (incorrectly named as "Lloyd's Syndicate QBE 1886" and "Lloyd's Syndicate ANV 1861");  
Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013 (incorrectly named as "Lloyd's Syndicate Mitsui 3210");  
Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612 (incorrectly named as "Lloyd's Consortium 9885 (a/k/a Starr Financial Lines Consortium 9885)" and "Lloyd's Syndicate QBE 1886");  
Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500642 (incorrectly named as "Lloyd's Syndicate Argo 1200");  
Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626 (incorrectly named as "Lloyd's Syndicate MIT 3210");  
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Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629 (incorrectly named as "Lloyd's Syndicate MIT 3210" and "Lloyd's Syndicate AMA 1200");  
Royal & Sun Alliance Insurance Company of Canada; and  
ACE INA Insurance Company

**CERTIFICATE OF SERVICE**

I certify that on January 12, 2018, I caused the forgoing document to be electronically submitted and filed with the Clerk of the U.S. District Court, District of New Jersey, using the Court's electronic case filing system.

By: /s/ Rosemary Kemmerle  
Rosemary Kemmerle, Legal  
Assistant to Sean X. Kelly, Esquire